

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

**DKYLE JAMAL BRIDGES
KRISTIAN JONES**

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CRIMINAL NO. 18-193

**DEFENDANTS' JOINT RESPONSE IN OPPOSITION TO THE
GOVERNMENT'S MOTION TO ADMIT AUDIO RECORDINGS**

Defendants Dkyle Jamal Bridges and Kristian Jones are charged with conspiring to commit sex trafficking and three counts of sex trafficking of minors by force, threats, and means of force. The government's Motion seeks permission to introduce into evidence audio recordings capturing telephone calls between the Defendants, and between the Defendants and others, pursuant to *United States v. Starks*, 515 F.2d 112 (3d Cir. 1975). The government's audio recordings in its possession had not yet been produced to the defense at the time the government's Motion was filed. Indeed, the defense only received the recordings less than one week before the parties' responses to pretrial motions are due. And the government, as noted in its Motion, has not yet identified which specific recordings it intends to publish at trial. Accordingly, the Defendants reserve the right to object to the admission of the audio recordings.

Respectfully submitted,

/s/ Andrew Montroy
ANDREW MONTROY, ESQUIRE

/s/ Leigh M. Skipper
LEIGH M. SKIPPER
Chief Federal Defender

CERTIFICATE OF SERVICE

We, Andrew Montroy, Esquire, and Leigh M. Skipper, Chief Federal Defender, hereby certify that we electronically filed and served a copy of Defendants' Joint Response in Opposition to the Government's Motion to Admit Audio Recordings upon Seth M. Schlessinger, Assistant United States Attorney, United States Attorney's Office, Suite 1250, 615 Chestnut Street, Philadelphia, Pennsylvania 19106 and upon Jessica L. Urban, Esquire, Trial Attorney, United States Department of Justice, Criminal Division, 1400 New York Avenue, N.W., Washington, D.C. 20005.

/s/ Andrew Montroy
ANDREW MONTROY, ESQUIRE

/s/ Leigh M. Skipper
LEIGH M. SKIPPER
Chief Federal Defender

DATE: October 31, 2018